

Section 3, Remarks:

REMARKS

Re-examination and reconsideration of this case is respectfully requested for the 20 claims now in this case in view of the amendments to the claims presented in the Response filed July 10th, the first Supplemental Response of August 28, 2006 and the additional amendments to Claims 1, 11 and 14 presented herewith.

Applicant in the Response of July 10 moved three limitations from the dependent claims 2 and 12 into the main claims 1 and 11, parts e) i) – iii) and c) i) – iii), respectively. Two of those functionalities were indicated in the first Office Action to not be shown by the prior art, and Applicant provided facts and discussion why the third was not disclosed in the references. In the Supplemental Response, Applicant moved the sticky path functionality from dependent Claim 2 into main Claim 1 as part e) iv). Likewise the sticky path step from dependent method Claim 12 was moved into main Claim 11 as step e) iv). The sticky path functionality was also acknowledged as novel in the Office Action. .

In this amendment, Applicant clarifies the meaning of “collecti on-based” in its reference to key phrase hypertext linking functionality of claims 1 e) i) and 11 c) i). That phrase was removed and replaced as follows:

i) [~~collection-based~~] key phrase hypertext linking between an object[~~s~~] and a collection[~~s~~] in which the[~~y~~] object is [are] contained, **said key phrase comprising at least one of the criteria of said collection;**

First, the term “hyperl inking” was corrected in these claims to be in accord with the Specification at page 19, line 29, wherein “hyper-tex t linking” is the term used. In addition, the concept of the key phrase as “based on” the collection, that is, operating within the collection, was clarified by stating the “key phrase comprising at least one of the criteria of said collection.” The remainder of the amendments to those sub-sections are grammatical, relating to tense and number (singular/plural).

Basis for the amendments to e) i) and c) i) is found throughout the Specification, for example, at page 9, lines 3 – 6, Figures 16a and 16b, and page 19, lines 27 -33. That “key phrase” is a criteria is found on page 9, and the hypertext linking function description is found on page 19 and illustrated in the Figures. Accordingly, no new matter has been added by these amendments, and allowance of all claims is respectfully urged.

In addition, Applicant noted an error in the language of Claim 1 e) iv) and an inconsistency of that language with Claim 11, c) iv). The sticky path functionality relates to hierarchical scrolling display, not collections. This inadvertent mis-description was corrected.

Finally, Applicant noted in Claim 14, the phrase "so that" had been omitted and the claim did not read grammatically correctly, so it was corrected by the insertion of that phrase.

In order to not burden the file by duplication of arguments, Applicant incorporates by reference herein the amendments to claims and the Remarks Section 3 of the Responses filed July 10, 2006 and August 28, 2006. .

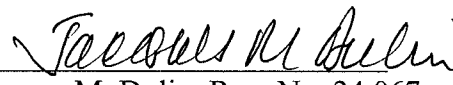
Applicant also makes of record the filing on Sept 12 by Express Mail of an archival copy of the three QuickTime demonstration movies 1 – 3: Sticky Path, Classification and Key Phrases functionalities, respectively. These functionalities were demonstrated live in the Webex video conference on Sept 12.

It should be understood that the archival CD QuickTime movies and Webex demonstrations are exemplary only and not the only possible implementations of the features of the inventive MFS system and program. The functionalities are also illustrated in the drawings and Figures as filed, along with the accompanying text of the Specification.

Favorable action of allowance of all claims is respectfully requested. In the event that there remain any open issues, the Examiner is requested to expedite the prosecution of this case by calling undersigned counsel for Applicant to resolve such issues.

Respectfully submitted,
Dr. Bruce Horn, Applicant

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by: 
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End of Section 3, Remarks

End of Second Supplemental Response to Office Action